

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Donald Jacob Burrs, Jr.
a/k/a Donald Jacob Burrs

Debtor 1

Joyce Melinda Burrs

Debtor 2

Exeter Finance

Movant(s)

v.

Donald Jacob Burrs, Jr.
a/k/a Donald Jacob Burrs

Joyce Melinda Burrs

Respondent(s)

Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee

Additional Respondent

Chapter 13

Case No. 1:22-BK-02516-HWV

Matter: Motion for Relief from the Automatic Stay

Document No. 73

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Donald Jacob Burrs, Jr. and Joyce Melinda Burrs, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph 2; therefore, it is denied.
3. Upon information and belief, the averments as stated in Paragraph 3 are admitted.
4. Upon information and belief, the averments as stated in Paragraph 4 are admitted. By way of further response, Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.
5. Paragraph 5 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: May 1, 2024

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
PA ID No. 201207

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Camp Hill, PA 17011
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Wednesday, May 1, 2024, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)'**

Motion for Relief from the Automatic Stay in this proceeding via electronic means upon the following:

William Craig, Esquire
Eisenberg Gold & Agrawal & Craig
1040 Kings Highway North, Suite 200
Cherry Hill, NJ 08034
Counsel for Movant(s)

Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Sylvia H. Rambo United States Courthouse
1501 North Sixth Street, Floor 3
Harrisburg, PA 17102

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire